

Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 11, 2003



Mr. Mike Lipscomb Washington TRU Solutions P.O. Box 2078 Carlsbad, NM 88221-2078

RE:

Issuance of CARs 03-078 Through 03-080 Initiated During Audit A-03-23 of

WTS Safety and Health

Dear Mr. Lipscomb:

This is the re-issuance of Carlsbad Field Office (CBFO) Corrective Action Reports (CARs) 03-078 through 03-080 (letter number 03-2563) to clarify these CARs are in the final format and are not draft as stated in the Subject line of the letter previously received.

The CBFO performed Audit A-03-23of Washington TRU Solutions LLC (WTS) on September 8-9, 2003. The scope of this audit was the WTS Safety and Health Organization implementation of applicable Quality Assurance requirements defined in ASME/NQA-1, 1989 edition, and the CBFO and WTS Quality Assurance Program Documents (QAPDs). As a result of this audit, the subject CARs have been issued.

Please determine and document on the enclosed CAR continuation sheets your proposed corrective action plans for the CARs. Please forward proposed corrective action plans and schedules for completion of CAR 03-080 to me prior to the response due date identified in CAR block 14. CARs 03-078 and 03-079 do not require a corrective action plan.

If you have any questions or comments, please contact me at (505) 234-7442.

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Sincerely,

M. Lea Chism

Quality Assurance Specialist

Enclosure

030914

cc: w/enclosure	
A. Holland CBFO	*ED
M. Eagle, EPA	*ED
B. Walker, EEG	*ED
D. Winter, DNFSB	*ED
S. Zappe, NMED	*ED
N. Frank, CTAC	*ED
J. Field, CTAC	*ED
A. Pangle, CTAC	*ED
J. Hoff, WTS	*ED
B. Brown, WTS	*ED
L. Will, WTS	
K. Dunbar, WRES	·
CBFO QA File	
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INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION RESPONSE

WASTE ISOLATION PILOT PLANT U.S. DEPARTMENT OF ENERGY Carlsbad Field Office

CAR	VO: <u>03-7</u>	8, 03-79,	03-80
PAGE	1	OF	1

INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action in response to this corrective action report (CAR) by the due date identified in block 14 of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (block 5). This request must include justification for the delay and must be provided prior to the due date.

The response shall address the corrective actions indicated in block 12. As appropriate, develop the response in accordance with the following sequence and format:

In order to develop the CAR response, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The response shall include the following information, as appropriate to block 12.

- 1. Corrective action response for CAR#
- A. Remedial Action-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
- B. Extent and Impact of the Deficiency-Describe the investigative actions performed to determine the extent and impact of the condition and the results. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
- C. Root Cause Determination-Identify the root cause of the condition as determined through investigative action.
- D. Corrective Action to Preclude Recurrence-Identify the actions required to address the root cause of the condition in order to preclude recurrence.
- 2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
- 3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

CORRECTIVE ACTION REPORT

1. CAR No: 03-078	2. Activity Report No:	A-03-23	3. Page <u>1</u> of <u>2</u> .	
4. Controlling Document: WP 12-RL.01, I	R7	5. CBFO Assessmen	t Team Leader: M. Lea Chism	
6. Responsible Organization: WTS		7. CAQ Was Discus Whiteford	sed With: M. Akbarzadeh, G.	
8. Requirement that was violated: Subsection 3.4: "There are three types of conditions adverse to quality. Nonconforming whose conformance is indeterminate."	nditions requiring correctivng items or materials are the	e action. They are noncose which do not confor	conformance, variance, and m to specified requirements or	
Paragraph 3.3.1: "Audit results and recomme action, if necessary. A maximum of 30 days the effectiveness of the implemented correcti	is given to respond to the o	riting to the Laboratoric riginal reportThe QA	es Manager for review and corrective Officer will follow up by verifying	
9. Condition Adverse to Quality: Existing See attached continuation form for details.	controls for conditions adv	erse to quality were not	being used by WIPP Laboratories.	
10. Suggested Actions (Optional): None				
11a. Significant CAQ11b. Work Suspension Recommended11c. RCRA-Related11d. Accelerated Corrective Action Requi	(Yes or No): No (Yes or No): No (Yes or No): No ired (Yes or No): No			
12. Types of Actions: Remedial: X	Investigative: Root C	Cause: Actions to	Preclude Recurrence: X	
13. CAR Initiator: N. Frank	Da	te: <u>9/10/03</u> .		
14. Response Due Date: 10/2/03 Required Corrective Action Completi	on Date: N/A	ve Action Plan Requir	ed: NO	
15. a. Concurrence: La Chi M. Assessment Team Leader	09-11-03 b Date	N/A Responsible Assis	stant Manager Date	
cN/A Quality Assurance M	auager Date			
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet				
17. Acceptance of Proposed Corrective Ac	ctions:			
Assessment Team Leader	Date			
18. Verification of Corrective Action Com	pletion: (Use CAR Contin	uation Sheet)		
19a. Verified By:Name		Data		
19b. Trend Cause Code:		Date		
20. Closure: Quality Assurance Ma	anager	Date		

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CSFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No: 03-078				
1. CARINO: U3-U78	2. Activity No: A-03-23	3. Pagedt of		
Block # 9 : Condition Adverse to Quality (continued)				
Existing controls for conditions adverse to qualit	y were not being used by WIPP Laborate	ories.		
Items and samples that are found to be none NCR process. They are not tagged or segre resolve the problem.	outforming to a label does not match the	when the art and the same of t		
Conditions adverse to quality identified duri Informal list was not complete (required revidenment concerns.	ng the annual management assessment are issent to WP 12-RL1400 was not included	e not entered into a formal tracking system.). NCR and CAR systems are not used to		
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CORRECTIVE ACTION REPORT

1. CAR No: 03-079		7	
The state of the s	2. Activity Report No:	A-03-23	3. Page of
4. Controlling Document: WP 12-RL.01, F	17 and WP 12-5, Rev. 9	5. CBFO Assessmen	nt Team Leader: M. Lea Chism
6. Responsible Organization: WTS		7. CAQ Was Discus Whiteford, D. Kump	sed With: M. Akbarzadeh, G.
8. Requirement that was violated:	·	Romander and Marian (Marian Marian) (Marian Marian) (Marian Marian) (Marian Marian) (Marian) (Marian Marian) (Marian Marian) (Marian Marian) (Marian) (M	основника на Сентенти (при се при на при н
See attached continuation sheet for details.			
9. Condition Adverse to Quality: See attached continuation sheet for details.	na tala ta 60.000 <u>-a da mandan kan</u> iningan pangan kanan da ang <mark>akang mandan manan</mark> da ang akang mandan menengka	онования в под на п	TT (gastalaniana) erita (gastalaniana) erita (gastalaniana) erita (gastalaniana) erita (gastalaniana) erita (g
10. Suggested Actions (Optional): None	And the second s	dan an min'ny kaodim-paositra dia dia mandra dia dia dia dia dia dia dia dia dia di	Norwayana a a a a a a a a a a a a a a a a a
11a. Significant CAQ 11b. Work Suspension Recommended 11c. RCRA-Related 11d. Accelerated Corrective Action Requir	(Yes or No): No (Yes or No): No (Yes or No): No red (Yes or No): No	nerenanne (generale de la composition della comp	
12. Types of Actions: Remedial: X I	***************************************	ause: Actions to	Precinde Recurrance V
13. CAR Initiator: N. Frank		e: <u>9/10/03</u>	
14. Response Due Date: 10/2/03 Required Corrective Action Completion 15. a. Concurrence: La Change Concurrence:	Correctiven Date: N/A	e: 9/10/03 . ve Action Plan Requir	
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CBFO CORRECTIVE ACTION REPORT

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1. CAR No: 79 2. Activity No: A-03-23 3. Page 2 of 2

Block # 8 : Requirement that was violated:

WP 12-RL.01, R7, Section 4.0: "Laboratories personnel must complete the appropriate training requirements prior to performing independent work. The qualification training programs currently in use in the Radiochemistry Laboratory are the Counting Room Technician Qualification Program (CRT-01), the Radiochemistry Technician Qualification Program (TRC-01), and the Staff Radiochemist Qualification Program (SRC-01), and the Counting Room Staff Qualification Program."

WP 12-5, Rev. 9, Paragraph 7.2.5: "Records of training and qualification in radiological control are maintained to demonstrate that an individual receive appropriate information to perform the work assignment in a save manner."

WP 14-TR.01, Rev. 8, Paragraph 12.0: "Technicians and maintenance personnel will be qualified to perform the tasks associated with their specialty, or will work under the direct supervision of personnel qualified to perform the activity or task."

Block # 9 : Condition Adverse to Quality (continued)

Training records were not up to date.

- 1. A Counting Room Technician had not completed the qualification card (CRT-01R), yet was performing independent work.
- The SME for Data Verification and Validation was designated on 8/22/01 by letter from the Manager. No "Oral/OJT Examination Coversheet" was in the file documenting the satisfactory oral board examination for SME.
- 3. A Staff Radiochemist was last qualified 3/27/01 to qualification card SRC-01. No subsequent requalification was on file. Qualification was good for two years.
- 4. A Radiological Engineer assigned to Station Effluent Air Monitoring had not completed qualification card RE-01, Rev. 1, yet was performing independent work.

CORRECTIVE ACTION REPORT

1. CAR No: 03-080	2. Activity Report No:	A-03-23	3. Page 1 of 2.
4. Controlling Document: WP 12-RL.01, F	R7 and WP 16.2, Rev. 4	5. CBFO Assessmen	t Team Leader: M. Lea Chism
6. Responsible Organization: WTS		7. CAQ Was Discuss Whiteford	sed With: M. Akbarzadeh, G.
8. Requirement that was violated:	•		ческое станова на при на п В при на при
See attached continuation sheet for details.			
9. Condition Adverse to Quality:		nest (organismosomistico) (organismosomisti (organismosomisti (organismosomisti (organismosomisti (organismoso	ogen menenske st <u>e ste ste kommen. A</u> n er e <mark>nem og det ste ste</mark> år de en en en ste ste ste ste ste ste ste ste ste ste ste ste
See attached continuation sheet for details.			
10. Suggested Actions (Optional): None	raur <mark>aganangan min</mark> as SAI Palalalan maranta in menandakan <mark>maranta kanandakan menandakan menandakan menandakan me</mark>	entre en	ti en
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11c. RCRA-Related	(Yes or No): No (Yes or No): No	. *	
11d. Accelerated Corrective Action Requir			
12. Types of Actions: Remedial: X I	nvestigative: X Root	Cause: X Actions	to Preclude Recurrence: X
13. CAR Initiator: N. Frank		***************************************	
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14. Response Due Date: 10/2/03		Annual State of the State of th	ed: YES
	Correctiv	/e Action Plan Require	ed: YES
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1. CAR No: 80	2. Activity No: A-03-	23	3. Page 2 of 2	
Block #8: Requirement that was violated	i: (continued)		en e	
WP 12-RL.01, R7, Subsection 8.4: "All software developed by WIPP Laboratories of must be documented, manually verified, and appropriate is subject to the same process prior to it accordance with site procedures."	Proved according to site is	STANASSTERNAS SANTANAS	tra isana lasa la kansana ang ang ang ang ang ang ang	4yr
WP 16.2, Rev. 4, Section 3.0: "An inventory of applicable software that identification resonand organization resonance (the sponsoring organization)."	ics the software name, ve sponsible for the software	rsion, classificat e shall be mainta	ion, exemption status, operating ined by the organization that own	s the
WP 16.2, Rev. 4, Introduction: "Changes to controlled software that require writ version number, classification, exemption status, A new Screening Checklist (EA16-2-1-0) should	Operating environment a	and the nerson or	owing: changes to the software nar ad organization responsible for the	me, e software.
Block #_9: Condition Adverse to Quality (continued)			
Two counting systems had control systems differ	ent from that listed on the	e Controlled Soft	tware List (CSL).	
 32-channel Alpha counter had "MCA Standard User Interface" V5.2, 1/31/199 	View/Control Program" 8 installed in October 20	', V2.6, released	March 1999, Canberra. CSL had	"Genie
 Gamma detectors had "Genie 2000 G 2000 Gamma Acquisition and Analysis" 	amma Acquisition and A , V1.4, January 29, 2000	malysis" V2.0, M installed in Octo	farch 2, 2001, Conberra. CSL ha ober 2000	d "Genie
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